

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GARY J. LONCZAK,
Plaintiff

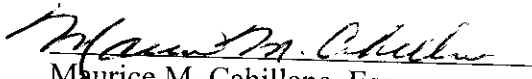
vs.

THE TOP-FLITE GOLF COMPANY,
Defendant

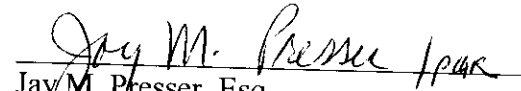
CIVIL ACTION NO.: 05-30180-MAP

JOINT STATEMENT

1. In accordance with Local Rule 16.1, the parties propose the following discovery plan:
 - A. Initial disclosures to be made within fourteen (14) days of the scheduling conference.
 - B. All written discovery and all depositions to be completed within eight (8) months of the scheduling conference.
 - C. All experts are to be disclosed within thirty (30) days after the close of regular discovery and all depositions or experts are to take place within thirty (30) days thereafter.
2. All dispositive motions are to be filed within thirty (30) days of the close of expert discovery with twenty-one (21) days for the response to any such motion.
3. The parties will file their certifications pursuant to L.R. 16.1(D)(3).


Maurice M. Cahillane, Esq.
BBO No. 069660
Counsel for Plaintiff
Egan, Flanagan and Cohen, P.C.
67 Market Street
Springfield, Massachusetts 01103
Tel: 413-737-0260; Fax: 413-737-0121

Dated: 9/15/05


Jay M. Presser, Esq.
BBO No. 405760
Counsel for Defendant
Skoler, Abbott & Presser, P.C.
One Monarch Place, Suite 2000
Springfield, Massachusetts 01144
Tel: 413-737-4753; Fax: 413-787-1941

Dated: 9/15/05